

Exhibit 55

Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

4 -----x

5 DONNA WOOD, et al, individually
6 and on behalf of all others
7 similarly situated,
8 Plaintiffs,
9 vs. Case No. 20 Civ. 2489(LTS) (GWG)
10 MIKE BLOOMBERG 2020, INC.,
11 Defendant.

12 -----x

13
14 VIDEOTAPE DEPOSITION OF
15 NICHOLAS COKER
16 VIA ZOOM VIDEOCONFERENCE
17 April 6, 2023
18 10:15 a.m.

19
20
21
22
23
24 Reported by:
25 Maureen Ratto, RPR, CCR

<p style="text-align: right;">Page 54</p> <p>1 NICHOLAS COKER 2 it up in a way that it essentially runs 3 itself. So I don't do work for that 4 business. I'm just kind of, like, a face 5 that shows up to represent it on 6 occasion, on a rare occasion.</p> <p>7 Q. And was that true in 2020 8 also?</p> <p>9 A. Yeah. Yeah. That's been true 10 for years.</p> <p>11 Q. If we can go back to Exhibit 12 4, please?</p> <p>13 So this resumé says you 14 started work for the Campaign in December 15 of 2019 and worked until March of 2020. 16 Do you know whether that's correct?</p> <p>17 A. No, I can't say whether that's 18 accurate right now. Oftentimes when 19 writing my resumé I can't remember 20 whether it's accurate so I just put the 21 dates down to the best of my recollection 22 because I never really expected somebody 23 to be going through it and being, like, 24 are you sure this is the date. This is a 25 first for me. I usually, when I'm putting</p>	<p style="text-align: right;">Page 56</p> <p>1 NICHOLAS COKER 2 outreach activities. That would be the 3 difference.</p> <p>4 Q. Okay. Did you plan any events 5 while you worked for the Campaign?</p> <p>6 A. I had -- I had some neighbors 7 come over to my house to see -- to see, 8 like, pamphlets and information about 9 Mike and to hand out yard signs and stuff 10 like that. And one other time, at a bar 11 that I used to work at Werewolf American 12 Pump, I just kind of went in there with 13 paperwork and handed it out. And those 14 were the only -- I guess that was the 15 closest thing to planning an event that I 16 did.</p> <p>17 As far as the events that I 18 attended, they were more planned by 19 people who were higher up than me and 20 basically my job was to help them set up 21 and break down after the event, setup 22 before the event, break down after the 23 event. And it was very similar to what I 24 do when I'm working as a cater waiter if 25 I had to compare it to something.</p>
<p style="text-align: right;">Page 55</p> <p>1 NICHOLAS COKER 2 my resumé together, just put the dates as 3 best I can remember them.</p> <p>4 Q. All right. And then there is a 5 paragraph under the dates that describes 6 things that you did for the Campaign.</p> <p>7 Do you know whether -- whether 8 that paragraph is accurate or not?</p> <p>9 MS. COLE-CHU: Objection to 10 form.</p> <p>11 A. I'd say it's fairly accurate. 12 There is a few things that I may have 13 tweaked a little bit.</p> <p>14 Q. What are those?</p> <p>15 A. Let's see. Okay. So I said 16 followup on unresolved tickets, but we 17 didn't have a ticket system. That was 18 something that I was saying to try to 19 sound more appealing to a customer 20 service job because they often use 21 ticketing systems to resolve issues with 22 the customer.</p> <p>23 Aside from that, I said that I 24 planned and organized public outreach 25 activities but I more attended public</p>	<p style="text-align: right;">Page 57</p> <p>1 NICHOLAS COKER</p> <p>2 Q. So you would set up the event 3 and then take things down at the end. And 4 did you stay -- did you stay at the event 5 while it was going on, though?</p> <p>6 A. Yeah. Yeah. I would be 7 required to be there.</p> <p>8 Q. And what would you do during 9 the event, after you set up and before 10 you were breaking down?</p> <p>11 A. I would talk with potential 12 voters.</p> <p>13 Q. About what?</p> <p>14 A. About Mike Bloomberg, of 15 course.</p> <p>16 Q. And how did you know what to 17 say?</p> <p>18 A. How did I know what to say 19 about Mike Bloomberg?</p> <p>20 Q. Yes.</p> <p>21 A. I'm not sure I understand the 22 question. I told you prior that when I 23 was swaying votes for Mike Bloomberg the 24 main thing that I used to sway votes was 25 letting them know that Mike planned on</p>

15 (Pages 54 - 57)

<p style="text-align: right;">Page 58</p> <p>1 NICHOLAS COKER 2 supporting whoever won the nomination. 3 And that someone who was willing to do 4 something like that for the good of the 5 party deserves your vote. And I swayed a 6 lot of votes that way. That was the 7 primary thing that I discussed with 8 potential voters.</p> <p>9 Q. Okay. Understood. That's a 10 good example.</p> <p>11 Are there other things that 12 you can think of that you also talked 13 about with voters?</p> <p>14 A. I'm sure there are but, you 15 know, right now I can't recall. It would 16 have been talking points that I was 17 given.</p> <p>18 Q. Do you remember that that's 19 true or are you guessing?</p> <p>20 A. I'm not sure whether or not I 21 can remember any specifics. I do know I 22 was given talking points, I know that for 23 a fact. And sometimes I would also use 24 those talking points to sway votes or to 25 discuss with voters. However, I can't</p>	<p style="text-align: right;">Page 60</p> <p>1 NICHOLAS COKER 2 evenings phone banking would often be 3 done at home.</p> <p>4 Q. When were you in the office on 5 a typical day, if there was a typical 6 day?</p> <p>7 A. Probably like eight-thirty 8 a.m., nine-thirty a.m. at the latest.</p> <p>9 Q. Until when?</p> <p>10 A. I would probably leave the 11 office around -- I can't -- I can't 12 really recall the dates so I'll do the 13 best I can to tell you but I would leave 14 the office around six, maybe six-thirty 15 and I would get home and then all any 16 colleagues would come and meet at my 17 house or we would all go to their house 18 and then we would start, like, an evening 19 phone banking session or we would do the 20 -- actually, we would usually do them 21 both at the same time, the Hustle app 22 that allowed you to send text messages 23 out to countless people.</p> <p>24 Q. Did you do any knocking on 25 doors?</p>
<p style="text-align: right;">Page 59</p> <p>1 NICHOLAS COKER 2 remember the specific talking points. 3 It's been too long.</p> <p>4 Q. Sure. And would you phrase 5 those talking points in your own words 6 whatever you thought would be most 7 persuasive or is that not accurate?</p> <p>8 A. I don't think that's 100% 9 accurate. I mean, it was in my voice, 10 yes, but I don't think that I changed the 11 talking points in any way that made them 12 different or my own. It was just me 13 regurgitating them.</p> <p>14 Q. This Exhibit 4 here says that 15 your title was field organizer and then 16 says hybrid modalities. What did you mean 17 by that?</p> <p>18 A. Sometimes I worked at home, 19 like, in the evenings when I would be 20 phone banking until nine p.m., sometimes 21 it would be one of the homes of my own 22 colleagues or out of my own home.</p> <p>23 Q. And sometimes in the office?</p> <p>24 A. Well, during the day it was 25 always in the office but late into the</p>	<p style="text-align: right;">Page 61</p> <p>1 NICHOLAS COKER 2 A. Yes, of course.</p> <p>3 Q. When would you do that?</p> <p>4 A. All different times. There 5 wasn't a specific time that was given for 6 knocking on doors. There were times where 7 we went and canvassed in Downtown San 8 Diego, where it wasn't, like, a specific 9 door knocking because they're not doors 10 but you're running into numerous people 11 on the streets talking about Mike. There 12 were -- I definitely did some knocking on 13 doors in the neighborhood by 3707 14 Imperial Avenue. I knocked on doors in 15 Bonita.</p> <p>16 Yeah, I don't know, I knocked 17 on doors in quite a few different areas 18 in San Diego. Sometimes I would go to 19 work in the Chula Vista office, sometimes 20 I would go to work in the Downtown 21 office.</p> <p>22 Q. Which did you go to more, 23 would you say, Chula Vista or Downtown?</p> <p>24 A. I can't remember honestly.</p> <p>25 Q. Exhibit 4 here says, "Used</p>

16 (Pages 58 - 61)

<p style="text-align: right;">Page 62</p> <p>1 NICHOLAS COKER 2 CRMs to update voter information." Do you 3 see that? 4 A. A-hum. 5 Q. What does that mean? 6 A. I updated the voter 7 information. So, like, we had, like, a 8 log with voter phone numbers, with their 9 age, with the party they typically vote 10 for and then if we called someone and 11 then it said that they were deceased, 12 then I would check "deceased" on the 13 thing. If it said they were no longer at 14 this address, this is their new phone 15 number, then I would add the new phone 16 number, things like that. 17 Q. It also says, "Managed 18 campaign and app-related issues from 19 constituents and committee members via 20 auto-dialing system." Do you see that? 21 A. A-hum. 22 Q. What did you do with respect 23 to that? 24 A. Well, there was an app that we 25 had to have potential voters download,</p>	<p style="text-align: right;">Page 64</p> <p>1 NICHOLAS COKER 2 So you had basically an 3 outline of what the job was in the 4 contract and then once you started you 5 had basically everyone that was above you 6 sending you emails, just adding more and 7 more things to it. 8 Q. And who would those emails 9 typically come from? 10 A. I can't remember. I just know 11 that there were people who were 12 important, who were in charge. They 13 weren't like me, they weren't worker 14 bees. 15 Q. Did you go through any 16 orientation or initial training? 17 A. You know, I can't remember. 18 Q. Did you get these emails about 19 job duties every single day? 20 A. The email would essentially be 21 a schedule for the day and, yes, I got 22 them every day, I got them late into the 23 night. I would get one at 10 p.m. that 24 said you needed to be up and ready for 25 something at seven a.m. and then I'd wake</p>
<p style="text-align: right;">Page 63</p> <p>1 NICHOLAS COKER 2 that was, like, a big thing that was 3 required of us. So we would essentially 4 just influence people to download this 5 app that could offer them more 6 information about Mike Bloomberg. 7 Q. Do you remember the name of 8 the app? 9 A. No, I do not. 10 Q. We can take thus exhibit down. 11 Thank you. When you started with the 12 Campaign how did you learn what your 13 duties would be? 14 A. They were pretty clearly 15 written out. 16 Q. What was the document where 17 they were written out? 18 A. I believe there was 19 information about the job duties in the 20 initial hiring paperwork and then in 21 addition to that I would receive, like, a 22 daily email that would have all the 23 additional job duties that were for that 24 day or meetings or places that you were 25 required to be at, things like that.</p>	<p style="text-align: right;">Page 65</p> <p>1 NICHOLAS COKER 2 up at six, at 5:58 it would say cancel 3 the seven a.m. Everything was -- my 4 email would just be going off all night 5 long, to the point where I started 6 shutting off my phone so that I could 7 just get a couple hours of sleep before I 8 had to be right back there again. 9 MR. BATTEN: Let's look at tab 10 36, please. 11 (Coker Exhibit 7, email string 12 dated February 18, 2020 was 13 received and marked on this date 14 for identification.) 15 Q. Let's scroll down. 16 CONCIERGE: And this is 17 Exhibit 7 for the record. 18 MR. BATTEN: Exhibit 7. Thank 19 you. 20 Q. Do you recognize these emails, 21 Mr. Coker? 22 A. Yeah. They look familiar. 23 Q. Let's go back up to the top, 24 please. The first email at the top is an 25 email from you to Sapphire Blackwood?</p>

<p>1 NICHOLAS COKER 2 app that that we used to send text 3 messages to potential voters. 4 Q. And I gather you were trained 5 on it sometime either on February 17th or 6 after that? Does that seem right? 7 A. Yes. I would assume so. 8 Q. So you were not trained on 9 Hustle before the middle of February. 10 A. You know, I don't -- I don't 11 know when I was trained on Hustle. I just 12 know that I was trained on it because I 13 used it frequently. I also know that I 14 was trained on it because we would have 15 volunteers come into our office and we 16 would log onto Hustle and sit a volunteer 17 at our computer to send messages. And 18 then we would do that at multiple 19 computers. So I not only had to know how 20 to use Hustle myself but I had to know 21 how to teach volunteers how to use 22 Hustle. So, yes, I was trained but I 23 don't know when. 24 Q. Let's take this exhibit down. 25 Do I understand you to say that you</p>	Page 74	<p>1 NICHOLAS COKER 2 was in Downtown San Diego, so that's 3 obviously not rural. There were times 4 when it was in Chula Vista, which might 5 be a little more urban and I'm not sure 6 what you mean by urban, if you mean, 7 like, communities with minorities or -- 8 Q. No. I just meant in terms of 9 density, urban versus suburban? 10 A. Okay. Well, yeah, I don't 11 know. You'll have to tell me whether 12 those are urban or suburb San Diego but 13 Downtown, Chula Vista and also around 14 3707 Imperial Avenue. 15 Q. Did you have a particular turf 16 or area that you were responsible for? 17 A. No. I can't say that you did 18 because I was frequently told to go to 19 different places. So there wasn't, like, 20 a specific turf that I was responsible 21 for. That would have been more the 22 regional organizers, they're specifically 23 responsible for a region. But I feel like 24 with my employment throughout the 25 Campaign as a field organizer I was</p>	Page 76
<p>1 NICHOLAS COKER 2 reported to some office, either actually 3 Chula Vista or Downtown every day? 4 A. Yes. 5 Q. And how many other field 6 organizers would be in the office with 7 you? 8 A. I can't remember specifically 9 but I'd say 20 maybe. 10 Q. 20? What kind of area were you 11 organizing in San Diego in terms of was 12 it urban? Rural? Mixed suburban? How 13 would you describe it? 14 A. I'm not sure I understand the 15 question. 16 Q. Well, you were out in the 17 community sometimes either canvassing or 18 knocking on doors or working on behalf of 19 the Campaign, right? 20 A. Yes. 21 Q. And would you describe the 22 places where you were doing that as urban 23 or suburban or rural or some combination? 24 A. I'd say a combination. As I 25 told you before, there were times when it</p>	Page 75	<p>1 NICHOLAS COKER 2 treated more like a floater, an unskilled 3 laborer that just went where I was 4 needed. 5 Q. And what was the region that 6 Sapphire Blackwood was responsible for? 7 A. I can't say. You'd have to ask 8 her. 9 MR. BATTEN: Let's look at tab 10 32, please. 11 MS. COLE-CHU: Mark, we've 12 been going for more than an hour. 13 When you get to the next convenient 14 -- 15 MR. BATTEN: Sure. Why don't 16 we stop. That's fine. Ten minutes? 17 Is that all right, Mr. Coker or do 18 you need longer than that? 19 THE WITNESS: Ten minutes is 20 fine with me. Thank you. I'll make 21 sure we mute the computer so we 22 don't have to discuss what I said 23 to my husband. 24 MR. BATTEN: That's fine. 25 Thank you.</p>	Page 77

<p style="text-align: right;">Page 78</p> <p>1 NICHOLAS COKER 2 MS. COLE-CHU: We'll come back 3 at 11:55. 4 VIDEOGRAPHER: Time is 11:46 5 a.m. Eastern Standard Time. We're 6 off the record. 7 (Recess is taken.) 8 VIDEOGRAPHER: We're on the 9 record. The time is 11:57 a.m. 10 Eastern Standard Time. 11 Q. If we can have tab 32, please? 12 (Coker Exhibit 8, email string 13 dated January 28, 2020 was received 14 and marked on this date for 15 identification.) 16 Q. Do you recognize this email, 17 which we'll scroll through the whole 18 thing briefly? Do you recognize this 19 document, Mr. Coker? 20 A. Yes, I do. 21 Q. What is this? 22 A. This was an event that my 23 supervisor Sapphire hosted and she asked 24 me to come with her and be backup there 25 and answer questions for people.</p>	<p style="text-align: right;">Page 80</p> <p>1 NICHOLAS COKER 2 attempted to sway votes of people who 3 maybe were on the fence. We also I think 4 -- well I say "we", but Sapphire I think 5 had a PowerPoint prepared that she showed 6 and then I stood in front of a desk with 7 my pamphlets and handed them out and 8 answered questions. 9 Q. You answered questions, is 10 that what you said? 11 A. Yes. 12 Q. Questions about what kinds of 13 things? 14 A. I believe questions about what 15 Mike Bloomberg's stance was on the LGBTQ 16 community. As far as I can remember that 17 was probably the main thing because there 18 were a lot of -- well, there weren't a 19 lot of people but the majority of the 20 people that were there I think were 21 members of the LGBTQ community. 22 Q. Did you try to recruit 23 volunteers from that group that evening? 24 A. I can't recall if I did. 25 Q. Was recruiting volunteers</p>
<p style="text-align: right;">Page 79</p> <p>1 NICHOLAS COKER 2 Q. Did you do that? 3 A. Yes, I did. 4 Q. Do you remember approximately 5 how many people attended? 6 A. No, I do not but -- one thing 7 I remember is that the space that we had 8 that -- "we" -- the space that Sapphire 9 had arranged for this to take place at 10 had, like, way too many seats. 11 So I can't remember the amount 12 of people but I just remember there were 13 hardly any people there. 14 Q. So fewer than 20 people? 15 A. Yeah, I'd say even less than 16 that maybe. 17 Q. Fewer than 10? 18 A. Yeah. 19 Q. So three or four, five people, 20 something like that? 21 A. Let's just say fewer than 10. 22 Q. Okay. And what's your best 23 recollection of what happened at this 24 event? 25 A. We discussed Bloomberg and we</p>	<p style="text-align: right;">Page 81</p> <p>1 NICHOLAS COKER 2 generally part of your job? 3 A. I -- I'd have to say yeah, 4 that was kind of an aspect of it, you 5 were to try to recruit people to come and 6 volunteer for phone banking but that 7 wasn't something -- how do I say? It 8 didn't seem like that was measured the 9 way that our other tasks were. 10 Q. Nobody was keeping track of 11 how successful you were with volunteers; 12 is that what you're saying? 13 MS. COLE-CHU: Objection to 14 form. 15 Q. You can still answer. 16 A. I don't know that they weren't 17 keeping track but it wasn't something 18 that they gave us, like a certain amount 19 of numbers that we had to fill. Whereas, 20 other things there was more, like, you 21 need to be doing this and there were 22 times when -- this never happened to me 23 personally but there were times when a 24 couple of my colleagues got singled out 25 for not -- not meeting a quota of phone</p>

<p style="text-align: right;">Page 82</p> <p>1 NICHOLAS COKER 2 banking. 3 Q. That never happened to you? 4 A. No one ever singled me out or 5 brought anything to my attention about -- 6 no one ever said anything to me except 7 that I was doing a good job. 8 Q. Did you always meet your 9 goals? 10 A. As far as I know, yes. 11 Q. Well, as far as you know, are 12 you not sure whether you made your goals 13 or not? 14 A. The people that didn't make 15 their goals would get pulled aside. There 16 wasn't, like, a big board in the center 17 of the office and had your goals and 18 whether or not you reached them and I 19 didn't have access to any type of, like, 20 project management software that I'm 21 assuming my supervisors had access to 22 that would allow them to track our 23 progress. I can't say, but I know when 24 you didn't hit your goals someone brought 25 it up and nobody ever brought it up to</p>	<p style="text-align: right;">Page 84</p> <p>1 NICHOLAS COKER 2 I was canvassing, my immediate supervisor 3 was right there canvassing with me. If I 4 was phone banking, she would usually be 5 there phone banking too. So not only 6 would the project management software 7 that allows them to track show them what 8 was going on, also the immediate 9 supervisor witnessing it firsthand would 10 let them know that I was doing what I was 11 supposed to. 12 Q. Well, you mention project 13 management software but you don't know 14 that that exists, do you? 15 A. Do I know that project 16 managements software exists? 17 Q. That the Campaign used it. 18 A. Do I know that the Campaign 19 used project management software? 20 Q. Right. 21 A. No, I'm assuming they may 22 have. But as far as project management 23 software existing, yeah, I'm very 24 familiar with it. 25 Q. Sure. My question wasn't</p>
<p style="text-align: right;">Page 83</p> <p>1 NICHOLAS COKER 2 me. So at one point I even remember 3 going, am I doing okay? Because I'm 4 constantly concerned, I want to make sure 5 I'm doing what I'm supposed to. And when 6 I asked that to Jesus he said yeah, 7 you're doing great. So as far as I know, 8 that's what I was doing. 9 Q. I'm sorry. I didn't mean to 10 interrupt you. 11 Did you know what your goals 12 were? Did somebody tell you you need to 13 make this many phone calls or knock on 14 this many doors or whatever it was? 15 A. I don't think there was a 16 number for phone calls or a number for 17 doors but there would an allotted time. 18 Like, I will get a direction that you 19 need to spend this many hours doing this 20 or this many hours doing that. 21 Q. How would the Campaign know 22 that you were spending the number of 23 hours that you were supposed to? 24 A. Well, my immediate supervisor 25 was with me, like, 95% of the time. So if</p>	<p style="text-align: right;">Page 85</p> <p>1 NICHOLAS COKER 2 clear. You had said you thought maybe the 3 Campaign's project management software 4 was allowing them to track your hours, 5 but you don't know that the Campaign had 6 project management software to do that, 7 do you? 8 A. No, I do not. That was an 9 assumption. 10 Q. Okay. And with respect to your 11 -- to Sapphire, is that who you were 12 referring to being with you at all times? 13 A. Yes. Sapphire, the Regional 14 Director, was with me the majority of the 15 time. 16 Q. Okay. 17 A. As well as other co-workers, 18 field organizers. 19 Q. And you described going home 20 at the end of the day and making calls 21 from there. Was Sapphire with you at your 22 house? 23 A. Yeah. She was with me at my 24 house when we did it at my house and 25 other times when we did it at -- huh,</p>

22 (Pages 82 - 85)

<p>1 NICHOLAS COKER 2 Q. Did you attend a gun safety 3 event -- 4 A. Yes, I did. 5 Q. -- in January of 2020? 6 Who was there? 7 A. I can't remember. 8 Q. Who is Beth Penny? 9 A. I believe she was the personal 10 assistant to Mary Anne Pintar. 11 Q. Who is Mary Anne? 12 A. She was somebody really 13 important. I just know because she would 14 say things and then everyone would 15 scurry. I don't remember what her title 16 was but I know that Sapphire was in 17 charge of me and I know that Jesus 18 Cardenas was in charge of Sapphire and I 19 knew that Mary Anne Pintar was in charge 20 of Jesus. I don't know how I knew but you 21 could just tell that each one was 22 communicating with their boss. 23 Q. Did you have a role at this 24 gun safety event? 25 A. Just to be a body, help set</p>	<p>Page 90</p> <p>1 NICHOLAS COKER 2 A. Yeah, if that's what it says. 3 Q. You don't know one way or the 4 other? 5 A. I mean, I'm assuming that's 6 what it says because that's what's 7 written there but prior to you showing me 8 this I didn't know what her title was. 9 Q. And this doesn't refresh your 10 memory? 11 A. Again, she was a boss, like, 12 high up person and I was like a peon. So, 13 like, you know, now that you put it in 14 front of me, yeah, I'm assuming, yeah, 15 she was the regional political director. 16 But in my mind she was just a boss. 17 That's what I'm trying to make clear to 18 you, she was just a boss. 19 Q. Let's go back up to the top of 20 the document, please. 21 So towards the bottom of 22 what's visible there is an email from 23 Beth Penny February 3rd, 11:08. "Mary 24 Anne would like us to read through this 25 important operations info." Do you see</p>
<p>1 NICHOLAS COKER 2 up, break down, typical cater waiter 3 stuff. 4 Q. And in between setting up and 5 breaking down, did you have a role? 6 A. No. I mean -- 7 Q. You didn't speak to anybody at 8 the event? 9 A. I spoke to people at the event 10 but I'm not familiar with gun safety. I 11 don't own a firearm and I don't plan on 12 owning a firearm. So this was something a 13 little out of my element. I just attended 14 because I was told by someone important 15 that they needed people there. And 16 essentially, like, that's -- that 17 happened frequently. 18 Q. Let's look at tab 34. 19 (Coker Exhibit 10, email dated 20 February 4, 2020 was received and 21 marked on this date for 22 identification.) 23 Q. Let's scroll down to see the 24 whole thing. This says Mary Anne was the 25 Regional Director; is that right?</p>	<p>Page 91</p> <p>1 NICHOLAS COKER 2 that? 3 A. A-huh. 4 Q. And it looks like you 5 responded and said you were looking 6 forward to taking action after you return 7 from hearing Mike speak in Compton, 8 right? 9 MS. COLE-CHU: Objection to 10 form. 11 A. Yes. 12 Q. Do you see the email I was 13 reading from? 14 A. Yes. 15 Q. Did you hear Mike speak in 16 Compton? 17 A. I did. I went with my 18 supervisor, Sapphire Blackwell -- 19 Blackwood. I'm going to keep getting it 20 wrong. I apologize. 21 Q. And in a subsequent email you 22 say, "We will take tons of pics and post 23 them and videos on the political channel 24 on Slack." Do you see that? 25 A. Yes.</p>

24 (Pages 90 - 93)

<p style="text-align: right;">Page 126</p> <p>1 NICHOLAS COKER 2 being done the way they were supposed to. 3 Q. Okay. 4 A. And then I would report back 5 to our supervisor if they weren't, and 6 the supervisor would take action. 7 Q. But you don't know whether the 8 Campaign did the same thing? 9 A. I don't know. No. 10 Q. Did you ever interact with any 11 voters who were outside of California? 12 MS. COLE-CHU: Objection to 13 form. 14 A. I did not. Only people in 15 California. 16 Q. How about on the phone, did 17 you ever talk to anybody -- excuse me. 18 Did you ever talk to any voters who were 19 outside of California on the phone? 20 A. No, I did not. 21 Q. Did you participate in staff 22 calls? 23 A. Yes. 24 Q. How often did that happen? 25 A. Daily.</p>	<p style="text-align: right;">Page 128</p> <p>1 NICHOLAS COKER 2 something about that earlier where I 3 would get emails until, like, three 4 o'clock in the morning, five o'clock in 5 the morning and I'd have to find the most 6 recent one to be, like, okay this is what 7 time the call is at. 8 Q. So except for when things were 9 adjusted, what was the normal schedule of 10 calls that involved people from the 11 national Campaign, people from out of 12 state? 13 A. I can't recall the normal 14 schedule. I can just tell you that they 15 would sometimes be in the morning and 16 they would sometimes be in the afternoon. 17 Like, the one that Mike Bloomberg himself 18 spoke on was in the afternoon. 19 Q. Was it a monthly, weekly kind 20 of thing? Was there that kind of 21 regularly to it? I'm talking about the 22 out of state staff calls. 23 A. There was a regularity to us 24 having people out of state on a 25 conference call, yes. I don't know</p>
<p style="text-align: right;">Page 127</p> <p>1 NICHOLAS COKER 2 Q. Who was the staff, just by 3 sort of geography, who were the staff 4 that were on those daily calls? 5 A. It would depend for each call. 6 Sometimes it was people all over the 7 U.S., sometimes it was people just in San 8 Diego, sometimes it was the entire State 9 of California. It just depended. 10 Q. How often were there calls 11 where people -- where Campaign staff from 12 out of state were on the call? 13 A. Quite a bit. 14 Q. Was there a set schedule for 15 calls with national staff? 16 A. Yes. There was a schedule with 17 calls. 18 Q. Sorry. Say that again. 19 A. It was a schedule for the 20 calls but it would be like adjusted 21 frequently, switched around because the 22 more important people, when they weren't 23 available because something came up, then 24 it would just be, like, okay, now the 25 call is at this time. I think I had said</p>	<p style="text-align: right;">Page 129</p> <p>1 NICHOLAS COKER 2 whether it was, like, literally every 3 single staffer for the U.S. but there 4 would be people who were on the 5 conference calls who were higher up that 6 were maybe not in the same state or city 7 as me frequently. 8 Q. And I'm saying did that happen 9 monthly or weekly or some other -- 10 A. I couldn't tell you. It seems 11 like more than monthly, probably weekly 12 but I don't know for sure. 13 Q. You don't know. Okay. You 14 said today that you were often in the 15 office and then also sometimes in the 16 field. 17 Can you estimate, like, what 18 percentage of the time you were in the 19 office versus out in the field? 20 MS. COLE-CHU: Objection to 21 form. 22 Q. You may answer. 23 A. Typically I just did what I 24 was told to do that day and it would 25 change, like, I feel like I would arrive</p>

33 (Pages 126 - 129)

<p style="text-align: right;">Page 130</p> <p>1 NICHOLAS COKER 2 at the office and I would receive 3 marching orders from either June or Beth 4 or Sapphire or Jesus and that would kind 5 of determine how the day went. Because 6 even though there was somewhat of a 7 schedule, I think based on what the 8 supervisors felt was necessary, that 9 schedule was just constantly adjusted.</p> <p>10 So, like, if they felt like 11 there weren't enough calls, then they 12 would put you on phone banking. If they 13 felt like they needed you to set up for 14 an event, then they would send you to set 15 up for an event. If they needed you to go 16 get ice, you would go get ice. It was 17 just -- I just went where I was told 18 frequently and if I wasn't told anything, 19 then I would just follow the schedule 20 that was given to me.</p> <p>21 Q. Overall, you're not able to 22 tell me sort of what percentage of the 23 time you were in the office and what 24 percentage of the time you were out in 25 the field?</p>	<p style="text-align: right;">Page 132</p> <p>1 NICHOLAS COKER 2 you know, even though I did feel like the 3 hours were insanely long and I did feel 4 like I never got breaks, I also felt 5 grateful. So I wouldn't have done 6 anything to jeopardize that.</p> <p>7 Q. You heard a rumor, though, 8 that others worked on other people's 9 campaigns, other candidate's campaigns.</p> <p>10 A. I had heard that at the 11 Downtown office, yes. There was a rumor 12 that someone, like, phone banked and had 13 done something for another Campaign or 14 mentioned another candidate. And, you 15 know, there were a lot of whispers about 16 it. But I recall being, like, who was it 17 who was it? And one knew who it was, 18 so...</p> <p>19 Q. Do you know who told you about 20 the rumor.</p> <p>21 A. I think it was June -- June, 22 Maureen and I can't remember the other 23 lady's name. She was very kind. She was 24 an Asian American and her husband was a 25 doctor. I recall her being in the group</p>
<p style="text-align: right;">Page 131</p> <p>1 NICHOLAS COKER 2 A. Not with enough accuracy that 3 I would be confident in. I'm sorry.</p> <p>4 Q. Okay. Are you aware of any 5 field organizers who were promoting other 6 campaigns when they were supposed to be 7 out canvassing for Bloomberg?</p> <p>8 A. I had heard a rumor about that 9 but I never -- there was never, like, a 10 specific person that anyone had said did 11 it. So...</p> <p>12 Q. Did you ever do that?</p> <p>13 A. Huh?</p> <p>14 Q. Did you ever do that?</p> <p>15 A. No, I did not do that. No.</p> <p>16 Q. Were you aware of -- I'm 17 sorry. Go ahead.</p> <p>18 A. I was happy to have that 19 opportunity and that job and I was very 20 grateful for it. I wouldn't have done 21 anything to have risked losing it. It was 22 very important to me. It was more money 23 than I had made from, you know, most of 24 my jobs, almost \$20,000 more than what I 25 was typically paid a year. So I didn't --</p>	<p style="text-align: right;">Page 133</p> <p>1 NICHOLAS COKER 2 at the table that said it. But yeah, no 3 one ever said who it was. It was, like, 4 everyone was kind of suspicious of 5 everyone else but I never found out who.</p> <p>6 Q. And when these people were 7 talking to you about it were they saying 8 they had heard a rumor or they said they 9 knew who it was and just didn't want to 10 talk about it?</p> <p>11 A. No one said they knew who it 12 was and they didn't want to talk about 13 it. They were just whispering about it; 14 did you hear that someone was maybe 15 working on the other Campaign and I was 16 like no, I didn't. Like, what was it? 17 What happened? It was a thing like that. 18 And then, you know, people; who was it? 19 Who was it? And then no one ever said 20 who it was, so I don't know. I'm curious. 21 I would be curious to know who it was.</p> <p>22 Q. Was it your understanding that 23 it was just one person or multiple 24 people?</p> <p>25 A. It was my understanding that</p>

<p style="text-align: right;">Page 138</p> <p>1 NICHOLAS COKER 2 A. No. Nobody -- nobody 3 reprimanded me but I did feel like they 4 were disappointed in me. 5 Q. What makes you say that? 6 A. They were just a little cold 7 to me the next day. 8 Q. Who are we talking about? 9 A. My supervisors. 10 Q. So Sapphire? 11 A. Actually, it wasn't Sapphire 12 that was cold, it was more June and the 13 other kind of higher-ups at the Downtown 14 office. 15 Q. Did anybody say anything about 16 your having taken a Sunday off? 17 A. Nobody specifically said 18 anything but I definitely felt 19 discouraged to do that again and I made 20 sure to finish out the rest of my time 21 there as scheduled. 22 Q. You didn't take any other days 23 off? 24 A. Not that I can recall. 25 Q. Were you required to keep</p>	<p style="text-align: right;">Page 140</p> <p>1 NICHOLAS COKER 2 and things like that, and I would stand 3 there during the event smiling, you know, 4 with my hands behind my back in my nicest 5 sport coat. And when the event was over 6 I would clean everything up. So that was 7 common. And then also phone banking on 8 the weekends was common as well and 9 canvassing, because that way you would 10 knock on people's doors and they would 11 actually be home. 12 Q. Did you ever complain about 13 the number of hours you were working? 14 A. Yeah, a lot. 15 Q. To whom. 16 A. To my husband. 17 Q. Did you ever complain about 18 the hours you were working to anybody on 19 the Campaign. 20 A. No. I was afraid to lose the 21 opportunity. I may have said it to a 22 colleague. I may have been like, gosh, I 23 am at the end of my rope, like, you know, 24 something like that. But, like, I didn't 25 say it to a superior because I wouldn't</p>
<p style="text-align: right;">Page 139</p> <p>1 NICHOLAS COKER 2 track of the hours that you worked in any 3 way? 4 MS. COLE-CHU: Objection to 5 form. 6 A. Not that I recall. 7 Q. Do you know how many hours a 8 week you worked. 9 A. Sometimes 70 hours a week or 10 more, it felt like. Yeah, 70 hours a week 11 or more, I'd say. 12 Q. And how do you come to that 13 number? 14 A. Just because roughly 12 hours 15 a day, seven days a week. 16 Q. Were the hours different on 17 the weekends than they were on the 18 weekdays? 19 A. Not that I recall. They were 20 pretty similar. Usually there was, like, 21 a time that an event would start at that 22 would be a reasonable time but, like I 23 said, I would be, like, a cater waiter 24 who would show up way before the event 25 and help set up the tables and the drinks</p>	<p style="text-align: right;">Page 141</p> <p>1 NICHOLAS COKER 2 want to risk losing the job. 3 Q. What did you do for lunch 4 while you were working? 5 MS. COLE-CHU: Objection to 6 form. 7 A. Frequently lunch was provided 8 for us at the office at our desk. We 9 would usually just sit at the desk and 10 eat in between phone banking. 11 At the time I remember -- I 12 remember actually feeling really grateful 13 that free lunch was provided for us. But 14 when I think about it now, it was -- it 15 seems like it was maybe to keep us at our 16 desk. 17 Q. Are you saying you were making 18 phone calls while you were having lunch? 19 A. Yes. 20 Q. It's probably a little 21 challenging to make a phone call with 22 your mouthful of sandwich, right? 23 MS. COLE-CHU: Objection to 24 form. 25 A. I think you would in between</p>

36 (Pages 138 - 141)

<p style="text-align: right;">Page 190</p> <p>1 NICHOLAS COKER 2 A. No, not even one. And also one 3 of the ones that was brought up is 4 actually the one that was cancelled due 5 to COVID. So nobody went on it, the one 6 in May, I think. 7 Q. You also gave testimony today 8 regarding training volunteers to use 9 Hustle. Do you recall that? 10 A. Yes, ma'am. 11 Q. Approximately how long did 12 that take, typically? 13 A. That could take -- it would 14 depend on the age of the volunteer 15 usually and, like, whether or not they 16 were used to using, like, cellular 17 devices or laptops. If they weren't 18 accustomed to those devices it could take 19 a significant amount of time. If they 20 were younger, which was actually kind of 21 more rare of an occurrence, it would 22 happen fast, but the majority of people 23 that were coming out to volunteer were 24 not familiar with technology, let's say. 25 Q. What did it involve, the</p>	<p style="text-align: right;">Page 192</p> <p>1 appreciate your time. 2 MS. COLE-CHU: You can sign 3 off, Nicholas. 4 VIDEOGRAPHER: We're off the 5 record. Time is 3:02 Eastern 6 Standard Time. This concludes 7 today's testimony given by Nicholas 8 Coker. 9 (The proceedings were 10 adjourned at 3:02 p.m.) 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 191</p> <p>1 NICHOLAS COKER 2 training? 3 A. Essentially it was showing 4 them how to use the Hustle app to contact 5 potential voters or constituents in the 6 area and just, you know, discuss 7 Bloomberg with them or notify them about 8 upcoming events or -- Hustle was actually 9 used quite a bit to recruit volunteers as 10 well because if you encountered someone 11 on Hustle who -- who was interested in 12 the Campaign and volunteering then you 13 would give them the information to come 14 down to the office and sign up in a time 15 slot. They had time slots posted at the 16 front of the office, I think. 17 Q. And did the Campaign provide 18 you with the information to provide the 19 prospective volunteers? 20 A. Yes. 21 MS. COLE-CHU: Those are my 22 only questions. 23 MR. BATTEEN: Nothing further 24 from me. Thank you. 25 THE WITNESS: Thank you all. I</p>	<p style="text-align: right;">Page 193</p> <p>1 C E R T I F I C A T E 2 I, MAUREEN M. RATTO, a 3 Registered Professional Reporter, do 4 hereby certify that prior to the 5 commencement of the examination, 6 WITNESS was sworn by me to testify the 7 truth, the whole truth and nothing but 8 the truth. 9 I DO FURTHER CERTIFY that the 10 foregoing is a true and accurate 11 transcript of the proceedings as taken 12 stenographically by and before me at 13 the time, place and on the date 14 hereinbefore set forth. 15 I DO FURTHER CERTIFY that I am 16 neither a relative nor employee nor 17 attorney nor counsel of any of the 18 parties to this action, and that I am 19 neither a relative nor employee of such 20 attorney or counsel, and that I am not 21 financially interested in this action. 22 23 24  MAUREEN M. RATTO, RPR 25 License No. 817125</p>

49 (Pages 190 - 193)